REMARKS

I. Introduction

In response to the Office Action dated April 21, 2005, claims 12-16, 23, 38-42, 49, 64-68, 70, and 75 have been amended. Claims 1-11, 25-37, 51-63, 77-89 are withdrawn from consideration, and claims 12-24, 38-50, 64-76 remain pending under consideration. Re-examination and re-consideration of the application, as amended, is requested. Applicants also note that claims 75-76 were not addressed in the Restriction Requirement, were addressed in the rejection by the Examiner, and remain pending.

II. Non-Art Rejections

In paragraph (4) of the Office Action, claims 12-24, 38-50, and 64-76 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Applicants have amended claims 12-16, 23, 38-42, 49, 64-8, 70, and 75 to overcome this rejection and submit that the rejections are now moot.

III. Prior Art Rejections

In paragraph (6) of the Office Action, claims 12-24, 38-50, and 64-76 were rejected under 35 U.S.C. §103(a) as being unpatentable over "Complex Queries in XML-GL" in view of McClendon et al., U.S. Patent No. 6,625,619 (McClendon).

Specifically, claims 12, 38, and 64 were rejected as follows:

> Claim 12, "Complex Queries in XML-GL" teaches a method for generating data in a self-expanding data package:
>
> generating, in the self-expanding data package, one or more values in a set of one or more constant lists (see section 2. Preliminary Overview of XML-GL);
>
> generating, in the self-expanding data package, one or more calculations that operate on one or more values in the set of one or more constant lists (see section 3. Simple Queries and see section 4. Complex Queries);
>
> wherein the self-expanding data package can be expanded, into an expanded table having expanded table rows, by combining every value in each constant list with any combination of values from remaining parameters and performing the one or more calculations on the one or more values (see section 4.2 Cartesian Product).
>
> "Complex Queries in XML-GL" does not each a computer system.
>
> McClendon et al. teaches an electronic taxonomy for construction product information, (see abstract) in which he teaches a computer system (see column 1, lines 14-21).

Therefore it would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified "Complex Queries in XML-GL" to include a computer system.

It would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified "Complex Queries in XL-GL" by the teachings of McClendon et al. because a computer system would allow the XML queries to be processed in a quick manner.

Claim 38, "Complex Queries in XML-GL" teaches an apparatus for generating data in a self-expanding data package in a computer system comprising:

generating a self-expanding data package and storing the self-expanding data package in the memory, wherein the self-expanding data package comprising:

(i) one or more values in a set of one or more constant lists (see section 2. Preliminary Overview of XML-GL); and

(ii) one or more calculations that operate on one or more values in the set of one or more constant lists (see section 3. Simple Queries and see section 4. Complex Queries);

wherein the self-expanding data package can be expanded into an expanded table having expanded table rows, by combining every value in each constant list with any combination of values from remaining parameters and performing the one or more calculations on the one or more values (see section 4.2 Cartesian Product).

"Complex Queries in XML-GL" does not each (a) a computer system having a memory and a data storage device coupled thereto; (b) one or more computer programs, performed by the computer system.

McClendon et al. teaches (a) a computer system having a memory and a data storage device coupled thereto; (b) one or more computer programs, performed by the computer system (see column 1, lines 14-21, and see figure 3, reference number 320).

Therefore it would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified "Complex Queries in XML-GL" to include (a) a computer system having a memory and a data storage device coupled thereto; (b) one or more computer programs, performed by the computer system.

It would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified "Complex Queries in XML-GL" by the teachings of McClendon et al. because (a) a computer system having a memory and a data storage device coupled thereto; (b) one or more computer programs, performed by the computer system would allow the XML queries to be processed in a quick manner.

As to claims 64, "Complex Queries in XML-GL" teaches performing a method for generating data in a self-expanding data package, the method comprising:

generating, in the self-expanding data package, one or more values in a set of one or more constant lists (see section 2. Preliminary Overview of XML-GL);

generating, in the self-expanding data package, one or more calculations that can operate on one or more values in the set of one or more constant lists (see section 3. Simple Queries and see section 4. Complex Queries);

wherein the self-expanding data package can be expanded, into an expanded table having expanded table rows, by combining every value in each constant list with any combination of values from remaining parameters and performing the one or more calculations on the one or more values (see section 4.2 Cartesian Product).

"Complex Queries in XML-GL" does not teach an article of manufacture comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer.

McClendon et al. teaches an article of manufacture comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer (column 1, lines 14-21 and see column 5 lines 53-61).

Therefore it would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified "Complex Queries in XML-GL" to include an article of

manufacture comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer.

It would have been obvious to a person having ordinary skill in the art at the time the invention was made to have modified "Complex Queries in XML-GL" by the teachings of McClendon et al. because an article of manufacture comprising a program storage medium readable by a computer and embodying one or more instructions executable by the computer would allow the XML queries to be processed in a quick manner.

Applicants respectfully traverse the above rejections for one or more of the following reasons:

(1) Neither "Complex Queries in XML-GL" nor McClendon teach, disclose or suggest a self-expanding data package that contains values in a constant list and calculations that operate on such values;

(2) Neither "Complex Queries in XML-GL" nor McClendon teach, disclose or suggest the expansion of a data package by performing calculations specified in the data package on constant list values in the data package; and

(3) Neither "Complex Queries in XML-GL" nor McClendon teach, disclose or suggest the expansion of a data package into an expanded table having rows based on the calculations performed on the constant values.

Independent claims 12, 38, and 64 are generally directed to the generation of a self-expanding data package. Specifically, values in a set of constant lists are generated and stored in the data package. In addition, calculations (that operate on the values) are generated and stored in the data package. Once the values and calculations are stored in the data package, the data package is transmitted to a second computer system that expands the data package. The claim limitations provide that the package is expanded into a table having rows. In addition, the expansion is performed by combining each value with other parameters (i.e., in the data package) and performing the calculations (from the data package) on the values. Accordingly, all of the information for expanding the data package is contained within the data package itself. In other words, the values for the set of constant lists and the calculations performed on the values are both generated and then stored in the data package.

The cited references do not teach nor suggest these various elements of Applicants' independent claims.

"Complex Queries in XML-GL" merely describes XML-GL which is a graphical query language over XML data that enables the retrieval and restructuring of XML documents using graphs (see Abstract and Introduction). In rejecting the generation of values in a set of constant lists, the Office Action relies on section 2. Preliminary Overview of XML-GL. Applicants note that this portion of the reference merely describes the use of XML graphs to conduct a query on an XML document and the ability to produce an XML document as a result. However, nowhere in the cited portion is there any generation of storage of values for constants in a data package.

The second claim element relates to calculations that operate on the values in the data package. In rejecting this element, the Office Action relies on section 3 and 4 relating to simple and complex queries. These portions of the reference merely describe the ability to present a graph to conduct simple or complex queries on an XML document. However, what is notoriously absent from these cited portions (and the remainder of the reference) is the storage of the queries in the data package. Moreover, the reference does not even remotely allude to storing such a query in the same data package as the values that the queries are performed on. In fact, the reference does not discuss the storage of the queries at all. Instead, the reference describes how to view and create queries using graphs as illustrated in FIGS. 4, 5, 6, 7, 8, 9, 10, 11, and 12.

In addition to the above, Applicants submit that the reference actually teaches away from the storage of the query in a package that can be expanded because the reference's queries are all graphic queries and not values, constants, or calculations as set forth in the claims. I

The claims also provide for expanding the data package by combining every value from the package with any combination of values and performing the calculations on the values to create a table having rows. The reference does not remotely suggest, allude to, or describe, explicitly or implicitly, a table whatsoever. In this regard, a resulting document is not a table with rows as set forth in the claims. In addition, the query result described in the reference was not created based on performing calculations (found within the XML document) on values for a set of constant lists also found within the XML document. Instead, a query is generated by a user graphically and performed on a document. Such a teaching is not even remotely similar to the presently claimed invention. Nor does such a teaching render the present invention obvious.

The Office Action relies on the Cartesian product query to teach the last element as claimed. However, as stated above, the Cartesian product section of the reference does not describe a table,

rows of a table, or performing calculations (wherein the calculations are round in the document) on values that are also found in the document. Instead, the Cartesian product merely uses multiple graphs that each contain unrelated elements that provide bindings to sub-elements of a new element node in another graph (i.e., the RHS). In fact, the figure shows the Cartesian product query that merely combines color elements of vehicles more recent than 1998 with all possible model elements. However, the combination (i.e., query) is not found in the list of vehicles containing the data.

Again, the claims relate to a single self-expanding data package that contains both calculations and data that the calculations are performed on. The references fail to teach, describe, or suggest such claim limitations.

Applicants also submit that McClendon fails to cure the deficiencies of the Complex Queries in XML-GL reference.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over "Complex Queries in XML-GL" and McClendon. In addition, Applicants' invention solves problems not recognized by "Complex Queries in XML-GL" and McClendon.

Thus, Applicants submit that independent claims 12, 38, and 64 are allowable over "Complex Queries in XML-GL" and McClendon . Further, dependent claims 13-24, 39-50, and 65-74 are submitted to be allowable over "Complex Queries in XML-GL" and McClendon in the same manner, because they are dependent on independent claims 12, 38, and 64, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 13-24, 39-50, and 65-74 recite additional novel elements not shown by "Complex Queries in XML-GL" and McClendon.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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